

MARGARET M. SHALLEY, ESQ.

MARGARET M. SHALLEY & ASSOCIATES, LLC

225 Broadway, Suite 715

New York, NY 10007

917-841-0231 (Phone)

212-566-8165 (Fax)

margaretshalley@aol.com

October 17, 2023

VIA ECF & EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *U.S. v. Kahlil Williams*
 22 CR 452 (CS)**

Dear Judge Seibel:

I am the attorney for Khalil Williams in the above-referenced matter. On February 15, 2022, Mr. Williams was released on a \$150,000 personal recognizance bond signed by two financially responsible persons with strict pre-trial supervision, home detention and location monitoring. The purpose of this letter is to respectfully request a modification of Mr. Williams' bond conditions. Mr. Williams' EDNY pre-trial officer contacted counsel today and informed that Mr. Williams has recently obtained employment at AutoZone, which he will begin on Thursday, October 19, 2023, from 9:00 a.m. to 3:00 p.m. Currently, he is permitted to be outside the home from 3:45 p.m. to 12:30 a.m. Monday through Friday to attend school, including travel time. In order to attend his new job, he will need to leave his residence at 7:45 a.m. to travel to work, then will travel directly to school following work. The added time for work would place Mr. Williams outside of the home for 16 hours and 45 minutes. Per the policy of pre-trial, they are unable to provide a schedule over 16 hours. A court order is needed to provide Mr. Williams a schedule to be outside the home from 7:45 a.m. to 12:30 a.m. the following day. Accordingly, it is respectfully requested that the Court modify Mr. Williams' bond conditions to permit him to be outside the home from 7:45 a.m. to 12:30 a.m. Monday through Friday to attend work and school.

The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,

/s/

Margaret M. Shalley

cc: All counsel (*via ECF and email*)

Pretrial Services may, in its discretion, authorize Mr. Williams to be out for 16 hours and 45 minutes only on days when he has both a 9-3 work schedule and school thereafter. Mr. Williams is reminded that he is to make no stops of any sort. He can be at work, at school and at home, and that's it.

SO ORDERED.

10/18/23


CATHY SEIBEL, U.S.D.J.